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Counsel for Plaintiff
Viral DRM LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VIRAL DRM LLC,

 Plaintiff,

v.

YOUTUBE UPLOADERS LISTED ON
 SCHEDULE A,

 Defendant.

CASE NO.: 3:23-CV-05977-JSC; 3:23-CV-06261-JSC; 3:23-CV-06598-JSC

**NOTICE UPDATING THE COURT ON
 PLAINTIFF’S INTENT REGARDING
 MATTERS CV-05977; CV-06261; AND CV-06598**

The Honorable Jacqueline Scott Corley

PLAINTIFF Viral DRM LLC (“Viral DRM”), by and through its undersigned counsel, hereby submits this Notice updating the Court on Plaintiff’s Intent to Proceed with the following matters: 1) 3:23-CV-05977-JSC; 2) 3:23-CV-06261-JSC; and 3) 3:23-CV-06598-JSC.

I. Motions for Subpoena

a. 3:23-cv-05977

On January 3, 2024, Plaintiff’s Counsel, Matthew Rollin, and Google’s Counsel, David Kramer, met and conferred via telephone as Ordered by the Court in ECF 11. Plaintiff filed a revised Proposed Order on January 16, 2024, at ECF 15. Plaintiff would like to proceed with the Motion for Subpoena. If the Court grants the motion, and once Google provides Plaintiff with the requested

1 information, Plaintiff will determine which entities are subject to the Court's jurisdiction, file new
2 complaints against those entities and dismiss the remaining parties from the action.

3 **b. 3:23-cv-06261**

4 On January 3, 2024, Plaintiff's Counsel, Matthew Rollin, and Google's Counsel, David
5 Kramer, met and conferred via telephone as Ordered by the Court in ECF 16. Plaintiff filed a revised
6 Proposed Order on January 16, 2024, at ECF 19. Plaintiff would like to proceed with the Motion for
7 Subpoena. If the Court grants the motion, and once Google provides Plaintiff with the requested
8 information, Plaintiff will determine which entities are subject to the Court's jurisdiction, file new
9 complaints against those entities and dismiss the remaining parties from the action.

10 **c. 3:23-cv-06598**

11 It is Plaintiff's intent to file a similar Motion for Subpoena in 3:23-cv-06598. If the Court
12 grants the motion, and once Google provides Plaintiff with the requested information, Plaintiff will
13 determine which entities are subject to the Court's jurisdiction, file new complaints against those
14 entities and dismiss the remaining parties from the action.

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16 DATED: February 27, 2024

Respectfully submitted,

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18 /s/ Matthew L. Rollin

MATTHEW L. ROLLIN

19 **SRIPLAW, P.A.**

20 *Counsel for Plaintiff Viral DRM LLC*
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